

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Saahidaa Mayfield
Debtor

Chapter 13
Bankruptcy No. 18-15140-elf

PennyMac Loan Services, LLC, or its Successor
or Assignee

Movant

vs.

Kenneth E. West, Trustee
Saahidaa Mayfield

Respondent(s)

**MOTION OF PENNYMAC LOAN SERVICES, LLC, OR ITS SUCCESSOR OR
ASSIGNEE FOR RELIEF FROM AUTOMATIC STAY UNDER ' 362(a)**

Movant: PennyMac Loan Services, LLC, or its Successor or Assignee

Mortgage dated April 21, 2015 and recorded April 28, 2015 in the Office of the Recorder of Delaware County as Instrument Number: 2015020408 in Mortgage Book 05633 Page 1225.

Assignment of Mortgage dated August 21, 2017 and recorded September 22, 2017 in the Office of the Recorder of Delaware County as Instrument Number: 2017051575 in Mortgage Book 06065 Page 0696.

1. PennyMac Loan Services, LLC, or its Successor or Assignee (hereinafter "Movant") holds a claim secured by a duly recorded Mortgage on property of Saahidaa Mayfield, or of the bankruptcy estate located at: 249 Le Carra Drive, Lansdowne, PA 19050.

2. Saahidaa Mayfield (hereinafter "Debtor") filed a Petition under Chapter 13 on August 3, 2018.

3. As of January 7, 2022, the Mortgage requires payments each month of \$1,096.20.

4. Movant has not received regular mortgage payments and lacks adequate protection of its interests.

5. Debtor is in default of post-petition payments to the present date from November 1, 2021.

6. The total amount of the post-petition arrearage as of this date is \$3,286.56. This figure is broken down as follows:

- Three (3) delinquent payments of \$1,096.20 for the months of November, 2021, through January, 2022
- Less suspense balance of \$2.04

7. Since January 7, 2022, Movant has incurred attorneys' fees in connection with this Motion.

8. Movant does not have and has not been offered adequate protection for its interest in said premises and may be required to pay expenses for said premises in order to preserve its lien, which is the obligation of the Debtor under said Mortgage.

9. Movant specifically requests permission from the Honorable Court to communicate with the Debtor and Debtor's counsel to the extent necessary to comply with applicable nonbankruptcy law.

WHEREFORE, Movant prays for an order modifying the automatic stay of Bankruptcy Code ' 362(a) to permit Movant to foreclose its Mortgage and to exercise any other rights it has under the Mortgage or with respect to the mortgaged property such actions may include but are not limited to selling the property at Sheriff Sale, entering into a loan modification or signing a deed in lieu of foreclosure; and

Further, granting Movant permission from this Honorable Court to communicate with the Debtor and Debtor's counsel to the extent necessary to comply with the applicable nonbankruptcy law.

/s/ Marisa Myers Cohen

MARGARET GAIRO, ESQUIRE ID # 34419
MARISA MYERS COHEN, ESQUIRE ID #87830
JAMES FRENCH, ESQUIRE ID # 319597
ANDREW M. LUBIN, ESQUIRE ID # 54297
Attorney for PennyMac Loan Services, LLC
123 South Broad Street, Suite 1400
Philadelphia, PA 19109
Telephone: (215) 790-1010
Facsimile: (215) 790-1274
Email: ecfmail@mwc-law.com